

Surface Water Permitting Proposal

As of April 19, 2010
(STEERING COMMITTEE DRAFT)

Compost Facilities with zero discharge to surface waters would be exempt from wastewater and stormwater permitting. There would be an allowance for discharge under extraordinary circumstances (25 year, 24 hour storm). Zero-discharge can be accomplished through a number of best management practices, including:

- a. Recycling of process water in operations
- b. On-site land application (within permitted boundaries)
- c. Establishment of cover over all operations.

All of these practices and applications are subject to compliance issues – if there are exceedences, then corrective measures may be required.

For those facilities that discharge to surface waters, wastewater treatment practices that would be recognized and accepted would include.

- a. Pump and haul
- b. Discharge to sewer
- c. Package plant
- d. Sequential best management practice mechanisms that effectively treat process water to discharge standards.
- e. Or other methods approved by DENR.

Compost Facilities that segregate their finished and un-finished (curing) product flows will have the ability to have a wastewater and stormwater permit for their discharges to surface waters. If the Compost Facility does not segregate their finished and unfinished product, and if their flows comingle, then all discharge to surface waters would have to be treated as wastewater and would require a more restricted wastewater permit.

Proposed New Changes to Compost Permitting Process:

General Permit: A new DWQ General Permit would be developed for Small Type 1 and Small Type 2 facilities and a new General Permit for Large Type 1 and Large Type 2 facilities. All of these facilities would apply for General Permit. These permits will cover both Stormwater and Wastewater discharge treatments. Type 3 and Type 4 Facilities would require individual DWQ stormwater and wastewater permits.

Monitoring Plan: A plan will be proposed that will outline what will be tested for, where to sample, the frequency of testing, established limits, how to report exceedences, and outline a process for corrective actions. This will be a tiered approach. Monitoring will not required for Small Type 1 and Small Type 2 Facilities, but they must agree to allow spot inspections by state inspectors, and subject violations if they exceed benchmarks.

Stormwater BMP's: A BMP Guidance Manual would be developed for Compost Facilities. It would be comprehensive manual describing types of practices that could be implemented or combined in a series to address specific compost related stormwater runoff treatment. These BMP's are not intend or designed for treating wastewater (leachate), but manual may outline on-site modifications to the facility to decrease the volume and makeup of wastewater discharge.

Extraordinary Storm Event: There will be allowance for discharge under extraordinary circumstances, such as a 25 year, 24 hour storm event. Washington State has an Emergency Stormwater Permit that allows them to discharge to a land application system in the event of an extraordinary storm event.

Finished Product: A definition and maturity test will be developed by DWM to determine when a product moves from the "curing" stage to the post process or finished product stage. There may be the need to have two types of finished products. One being an Agricultural Grade finished product that could be spread on agricultural fields (shorter maturity period) and one Consumer Grade finished (longer maturity period) product. Discharges from finished product piles for sT1, sT2, LT1, and LT2 would be treated as Stormwater initially, but elevated to wastewater if discharges consistently fail to meet benchmarks via tiered approach. Discharges from finished product piles for T3 (not consensus of group) and T4 facilities would have to be treated as wastewater. Facilities will be encouraged to segregate finished and curing piles, and design facility to keep discharges/runoff from these piles from mixing.

Naming: For the compost industry marketing purposes we like to call the stuff that percolates through the curing piles leachate or process water, not wastewater. By rule, when this leachate or process water leaves the site or is discharged off the facility, it should be called wastewater. As long as it remains on site it is called leachate or process water.

Certification of Operators: New process would require Certification of Compost Operators for LT1, LT2, T3 and T4 Facilities. Certification of Operators may not be required for sT1 and sT2 facilities.

Proposed Hybrid Permitting Program

	sT1 + sT2 (131 sites)	LT1 + LT2 (16 sites)	T3 (10 sites)	T4 (3 sites)	Comments
Permitting vehicle	A single <i>New General Permit</i> covering both Ww and Sw discharges	The same <i>new GP</i> , but with different provisions for large facilities	An individual Sw permit. A Sw individual permit, if flows are segregated.	An individual Ww permit. A sw individual permit, if flows are segregated.	Likely that the <i>new GP</i> will be <i>drafted and administered</i> by DWQ's SPU, with input on the Ww portion of the draft from the wastewater guys
Baseline permit provisions	Applicant must propose from a list of DWQ BMPs; BUT applicant still responsible for site performance: installation of a DWQ BMP is not sufficient permit compliance.	AND, volume control measures must be proposed.	Ww: 30/30 : N, P : metals : fecal : 12/yr Sw: statewide benchmarks & Tiered approach; SPPP; 4/yr sampling	Ww: 30/30 : N, P : metals : fecal : 12/yr Sw: the same as ←	Receiving water classification may make limits and benchmarks more stringent depending on the specific watershed in which the site is located. For T3 and T4, ww discharges likely will require a WwTP of some sort to meet limits. Suggested that we might combine Ww and Sw to create a new Compost WQ Permit for T3 and T4
Timing :announce :req'd of new :req'd of ex	1/1/11 1/1/11 10/1/12*	← 1/1/11 6/1/12	1/1/11 1/1/11 1/1/12	1/1/11 1/1/11 1/1/12	-As per HB1100 -DWM new or renew -*Date coverage required by S Law?
Finished product piles generate	Sw initially; But, elevated to Ww if discharges consistently fail to meet benchmarks via the Tiered approach* ->	Sw initially, But, <- also	Ww	Ww	* OR, kicked out of <i>new GP</i> , and into individual Ww permit, if discharges fail to meet benchmarks consistently via the Tiered approach

Other on-site materials generate	Ww	Ww	Ww	Ww	
Monitoring parameters	No Monitoring Plan required (TBD). Must allow for spot inspections by state inspector	Monitoring Plan will include (TBD): Frequency, Test parameters (e.g., fecal, BOD, etc) and sample locations	Monitoring Plan will include (TBD): Frequency, Test parameters (e.g., fecal, BOD, etc) and sample locations	Monitoring Plan will include (TBD): Frequency, Test parameters (e.g., fecal, BOD, etc) and sample locations	Monitoring Plan will include (TBD): Frequency, Test parameters (e.g., fecal, BOD, etc) and sample locations
Costs					
Certification of Operators	Maybe	Yes	Yes	Yes	NCCC may take initiative to develop certification training. SWANA too?

Key

- sT1** – Small Type 1 Facility
- sT2** – Small Type 2 Facility
- LT1** – Large Type 1 Facility
- LT2** – Large Type 2 Facility
- Sw** – Stormwater
- Ww** – Wastewater
- GP** – General Permit